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COPY

Attorneys for Defendants CITY OF IRVINE, a public entity, and RONALD CARR

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CRAIG F. MONTEILH,
Plaintiff

V.

FEDERAL BUREAU OF INVESTIGATION, a government entity; IRVINE POLICE DEPARTMENT, a government entity; RON CARR, an individual; BARBARA WALLS, an individual and DOES 1 to 100, inclusive.

Defendants.

CASE NO.: SACV10-00102-
JVS(RNBx)

DEFENDANT RON CARR'S RESPONSES TO REQUEST FOR ADMISSIONS, SET ONE

PROPOUNDING PARTY: Plaintiff CRAIG F. MONTEILH

RESPONDING PARTY: Defendant RON CARR

SET NO.: One

Defendant RON CARR (“Defendant”) hereby responds to the Request for Admissions, Set One, propounded by Plaintiff CRAIG F. MONTEILH (“Plaintiff”), without prejudice to subsequently discovered information, as follows:

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1 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

2 Defendant lacks sufficient information and belief to admit or deny this request
3 for admission and therefore denies the request in its entirety.

4 **REQUEST FOR ADMISSION NO. 10:**

5 Admit Frough Jahid spoke with Special Agent Ellis Kuppferman of the Federal
6 Bureau of Investigation (hereinafter "FBI") concerning PLAINTIFF.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

8 Defendant lacks sufficient information and belief to admit or deny this request
9 for admission and therefore denies the request in its entirety.

10 **REQUEST FOR ADMISSION NO. 11:**

11 Admit Frough Jahid investigated PLAINTIFF concerning charges of terrorism.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

13 Defendant lacks sufficient information and belief to admit or deny this request
14 for admission and therefore denies the request in its entirety.

15 **REQUEST FOR ADMISSION NO. 12:**

16 Admit Frough Jahid was present an arrest of PLAINTIFF.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

18 Defendant lacks sufficient information and belief to admit or deny this request
19 for admission and therefore denies the request in its entirety.

20 **REQUEST FOR ADMISSION NO. 13:**

21 Admit Frough Jahid spoke with YOU concerning PLAINTIFF.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

23 Admit.

24 **REQUEST FOR ADMISSION NO. 14:**

25 Admit Frough Jahid was aware PLAINTIFF was an FBI informant.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

27 Defendant lacks sufficient information and belief to admit or deny this request
28 for admission and therefore denies the request in its entirety.

PRELIMINARY STATEMENT

2 Defendant has not completed its investigation into or discovery of the facts in
3 this action. Some of the requested information may not be in current files and may be
4 difficult to obtain or unavailable as a result of personnel turnover, memories having
5 faded, and possible destruction of records authorized by document retention program
6 schedules. Defendant has made a good faith effort to obtain any relevant non-
7 privileged information from all the various departments within the CITY OF IRVINE
8 which might have access to or have stored such information. The information
9 produced is without prejudice to Defendant's right to produce evidence of any
10 information relating to any subsequently discovered facts and/or documents.

RESPONSES

REQUEST FOR ADMISSION NO. 1:

Admit Frough Jahid works for the Irvine Police Department.

RESPONSE TO REQUEST FOR ADMISSION NO. 1:

Admit.

REQUEST FOR ADMISSION NO. 2:

Admit Frough Jahid works for the Irvine Police Department, division of Special Investigations.

RESPONSE TO REQUEST FOR ADMISSION NO. 2:

Defendant lacks sufficient information and belief to admit or deny this request for admission and therefore denies the request in its entirety.

REQUEST FOR ADMISSION NO. 3:

Admit Frough Jahid is designated as “Detective – Intelligence” by the City of Irvine.

RESPONSE TO REQUEST FOR ADMISSION NO. 3:

Deny.

REQUEST FOR ADMISSION NO. 4:

Admit Frough Jahid was a member of the Orange County Joint Terrorism Task

1 **REQUEST FOR ADMISSION NO. 15:**

2 Admit YOU worked for the Irvine Police Department

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

4 Admit.

5 **REQUEST FOR ADMISSION NO. 16:**

6 Admit YOU worked for the Irvine Police Department, division of Special
7 Investigations.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

9 Deny.

10 **REQUEST FOR ADMISSION NO. 17:**

11 Admit YOU were designated as “Detective – Intelligence” by the Irvine Police
12 Department.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

14 Deny.

15 **REQUEST FOR ADMISSION NO. 18:**

16 Admit YOU were a member of the Orange County Joint Terrorism Task Force.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

18 Deny.

19 **REQUEST FOR ADMISSION NO. 19:**

20 Admit YOU spoke with Ahmadullah Sais Niazi concerning PLAINTIFF.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

22 Deny.

23 **REQUEST FOR ADMISSION NO. 20:**

24 Admit YOU spoke with Mohammed Elsyisy concerning PLAINTIFF.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

26 Deny.

27 **REQUEST FOR ADMISSION NO. 21:**

28 Admit YOU spoke with Issa Edah-Talley concerning PLAINTIFF.

1 **REQUEST FOR ADMISSION NO. 98:**

2 Admit YOU were aware PLAINTIFF was an FBI informant after arresting
3 PLAINTIFF.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 98:**

5 Admit that I was aware that Plaintiff had been reported to have been an
6 informant but I did not know if Plaintiff was or was not an informant on the date of
7 arrest.

8 **REQUEST FOR ADMISSION NO. 99:**

9 Admit YOU were informed by the OCJTTF that PLAINTIFF was an FBI
10 informant.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 99:**

12 Deny.

13 **REQUEST FOR ADMISSION NO. 100:**

14 Admit YOU were informed by the FBI that PLAINTIFF was an FBI informant.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 100:**

16 Admit that the FBI said it had worked with PLAINTIFF.

17 **REQUEST FOR ADMISSION NO. 101:**

18 Admit YOU arrested PLAINTIFF with the knowledge that he was an FBI
19 informant.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 101:**

21 Deny.

22 **REQUEST FOR ADMISSION NO. 102:**

23 Admit YOU accompanied a SWAT team to the home of PLAINTIFF.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 102:**

25 Deny.

26 **REQUEST FOR ADMISSION NO. 103:**

27 Admit YOU conspired with FBI agents to send the SWAT team to the home of
28 PLAINTIFF.

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF ORANGE

I have read the foregoing DEFENDANT RON CARR'S RESPONSES TO REQUESTS FOR ADMISSIONS, SET ONE and know its contents.

X CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and to those matters I believe them to be true.

I am an officer a partner of the City of Irvine, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in certain responses in the foregoing document are true. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for _____, a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

Executed on June 1, 2010, at Irvine, California.

I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct.

Ron Carr
Print Name of Signator

Signature